IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND (Greenbelt Division)

MARJORIE STEWART,)	
ET. AL.,)	
Plaintiff,)	
)	
v.)	Case No. 8:10-cv-02822-RWT
)	
HOWARD BIERMAN,)	
ET AL.,)	
)	
Defendant.	,	

MOTION FOR EXTENSION OF TIME TO FILE INITIAL RESPONSIVE PLEADING

Pursuant to Fed. R. Civ. Pro Rule 6(b)(1), Defendants respectfully request that the Court extend to January 6, 2011 the time within which all Defendants may initially plead or otherwise respond to the Complaint in this matter. The reasons supporting this request are contained in the attached Memorandum of Points and Authorities.

Dated: November 29, 2010 Respectfully submitted,

Howard Bierman, et al., Defendants

By Counsel

SANDS ANDERSON PC

/s/

J. Jonathan Schraub

(Maryland Bar No.: 01660)

(Federal Bar No.: 02708)

Paige Levy

jjschraub@sandsanderson.com

plevy@sandsanderson.com

1497 Chain Bridge Road, Suite 202

McLean, VA 22101

(703) 893-3600

(703) 893-8484 (fax)

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING was served via the ECF Filing System to the following on November 29, 2010:

Gerald Solomon Solomon & Bascietto, LLC 9857 Majestic Drive Boynton Beach, Florida 33437 Telephone: (800) 604-7449 Fax: (561) 735-3536

Email: jerry@saveyourdream.us

John J. Bascietto Solomon & Bascietto, LLC 4741 Sellman Road Beltsville, Maryland 20705 Telephone: (240) 206-6002 Email: johnbaslaw@gmail.com

Scott C. Borison 5500 Buckeystown Pike Frederick, Maryland 21703 Telephone: (301) 620-1016 Fax: (301) 620-1018 borison@legglaw.com

Michael Gregg Morin 124 South Street, Suite 3 Annapolis, Maryland 21401 Telephone: (410) 280-6133 Fax: (410) 280-8650

Email: mikemorin.morinlaw@gmail.com

J. Jonathan Schraub